

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

RICHARD DASCHBACH
*individually and on behalf of all
others similarly situated,*

Plaintiff,

v.

ROCKET MORTGAGE, LLC,

Defendant.

CASE NO. 1:22-cv-00346-JL

November 29, 2022

DECLARATION OF AMY COURTNEY

I, Amy Courtney, hereby declare and state as follows:

1. I am a Principal Data Analyst at Rocket Central, LLC, an affiliate of Rocket Mortgage, LLC (“Rocket Mortgage”).

2. I have been employed by Rocket Central as a Principal Data Analyst since May 18, 2020. In this role and my prior positions at Rocket Mortgage (f/k/a Quicken Loans, LLC)—where I have worked continuously since January 7, 2002—I have had various duties and responsibilities relating to reviewing, analyzing, collecting and identifying call and text records, client data, website pages and other data and information maintained in the ordinary course of business in Rocket Mortgage’s systems of record.

3. As part of Rocket Mortgage’s business model, its team members contact individuals who have expressed an interest in obtaining a mortgage loan or refinance and who have consented to being contacted about mortgage services. While some individuals visit

RocketMortgage.com or call the company's direct line, others visit and provide consent to be contacted through other websites, such as those run and owned by LMB Mortgage Services, Inc. d/b/a LowerMyBills.com ("LMB"). LMB is a company related to and affiliated with Rocket Mortgage, and both companies share the same parent company, RKT Holdings LLC.

4. From my review of the complaint in this lawsuit, I understand that Plaintiff Richard Daschbach ("Daschbach") alleges that Rocket Mortgage made calls to his cellular telephone number ending in -7110.

5. As a result of my duties and responsibilities at Rocket Mortgage, I have personal knowledge about Rocket Mortgage's records (electronic and hard copy) concerning communications and interactions between Rocket Mortgage and clients that are maintained in the ordinary course of business. As part of my duties at Rocket Central, I am regularly called upon to identify, collect, and review such available records.

6. I testify to the matters herein based upon my personal knowledge and experience, my review of Rocket Mortgage's non-privileged records available to me in the regular course of my duties, and my review of the complaint. The information provided herein is true and correct to the best of my current knowledge.

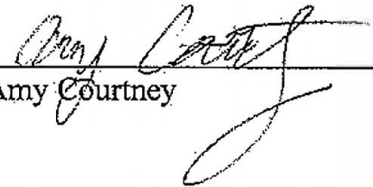
7. Rocket Mortgage's business records reflect that, on September 13, 2021, Rocket Mortgage received information from LMB that "Richard Daschbach" had submitted contact and other personal information about himself, including a phone number 603-777-7110 (which has the same last four digits as the phone number identified in the Complaint), an email address, and a physical address (4 Harvard St, Brentwood, NH 03833), to LMB as part of an inquiry to obtain information about a mortgage refinance.

8. Rocket Mortgage's business records also reflect that, on December 20, 2021, Rocket Mortgage received information from LMB that "Richard Daschbach" had submitted contact and other personal information about himself, including a phone number 603-777-7110 (which has the same last four digits as the phone number identified in the Complaint), an email address, and the same physical address in Exeter, NH to LMB as part of an inquiry to obtain information about a mortgage refinance.

9. Rocket Mortgage's business records reflect that it contacted Plaintiff by telephone to respond to his requests for mortgage refinance information only after it received his requests.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 29, 2022



Amy Courtney